

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	x	
	:	
UNITED STATES OF AMERICA	:	<u>STIPULATION AND ORDER</u>
- v. -	:	21 Cr. 343 (SHS)
YING SUN,	:	
	:	
Defendant.	:	
-----	x	

WHEREAS, on or about May 4, 2021, YING SUN (the “Defendant”), among others, was charged in a two-count Indictment, 21 Cr. 343 (SHS) (the “Indictment”), with conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h) (Count One); and conspiracy to operate an unlicensed money transmitting business, in violation of Title 18, United States Code, Section 371 (Count Two);

WHEREAS, the Indictment included a forfeiture allegation as to Counts One and Two of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), of any and all property, real and personal, involved in the offense charged in Counts One and Two of the Indictment, and any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in the offense charged in Counts One and Two of the Indictment, and various specific property;

WHEREAS, on or about March 13, 2023, the Defendant pled guilty to Count One of the Indictment, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count One of the Indictment and agreed to forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), a sum of money

equal to \$20,896,774 in United States currency, representing property involved in the offense charged in Count One of the Indictment;

WHEREAS, on or about June 13, 2023, the Court entered a Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment (the “Order of Forfeiture”) which: (i) imposed a forfeiture money judgment in the amount of \$20,896,774 in United States currency, representing the property involved in the offense charged in Count One of the Indictment; and (ii) ordered the forfeiture to the United States of all of the Defendant’s right, title, and interest in, *inter alia*, the following specific property:

- a. \$153,731 in United States currency seized from inside 144-20 38th Avenue, Queens, New York on or about April 10, 2020;
- b. \$60,000 in United States currency seized from an individual in front of 144-20 38th Avenue, Queens, New York on or about April 10, 2020;
- c. \$300,020 in United States currency seized from an individual at the intersection of Browne Street and Roosevelt Avenue in Queens, New York on or about April 10, 2020;
- d. \$2,726,075 in United States currency seized inside 461 Southard Street, Trenton, New jersey on or about April 16, 2020; and
- e. \$41,633 in United States currency seized inside 461 Southard Street, Trenton, New Jersey on or about April 16, 2020;

(a. through e., collectively, the “Subject Property”);

WHEREAS, on or about December 12, 2023, the United States provided notice of the entry of the Order of Forfeiture to Arrival Enterprises Inc., Yu Yan Yu and Lihua Zhao (the “Petitioners”), through their counsel Renee Wong, Esq., advising that should they wish to assert a legal interest in the Specific Property they would need to file a petition for a hearing to adjudicate

the validity of their alleged interest in the Subject Property within thirty (30) days of the receipt of the letter, in this case, by December 12, 2023;

WHEREAS, Renee Wong, Esq. has advised the Government of the Petitioners' potential interests in the Subject Property; and

WHEREAS, the Government has consented to an extension of the deadline for the Petitioners to file a petition asserting an interest in the Subject Property with the Court from January 16, 2024, to February 16, 2024;

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorneys Jonathan Bodansky and Matthew R. Shahabian, of counsel, and the Petitioners and their counsel Renee Wong, Esq., that:

1. The Petitioners shall have up to and including February 16, 2024, to file with the court a petition asserting an interest in the Subject Property.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

2. The signature page of this Stipulation and Order may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: Matthew Shahabian
JONATHAN BODANSKY
MATTHEW R. SHAHABIAN
Assistant United States Attorneys
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2385/1046

1/13/24

DATE

ARRIVAL ENTERPRISES, LLC

By: [Signature]

1/11/2024

DATE

YING YU YAN

By: [Signature]
Ying Yu Yan, Petitioner

1/11/2024

DATE

Lihua Zhao

By: [Signature]
Lihua Zhao, Petitioner

1/11/2024

DATE

[SIGNATURES CONTINUE ON FOLLOWING PAGE]

By:

Renee Wong

RENEE WONG, ESQ.

Attorney for Petitioners-

Arrival Enterprises Inc.,

Yu Yan Yu and Lihua Zhao

401 Broadway, Suite 306

New York, NY 10013

January 12, 2024

DATE

SO ORDERED:

January 17, 2024

Sidney H. Stein

HONORABLE SIDNEY H. STEIN
UNITED STATES DISTRICT JUDGE

January 17, 2024

DATE